

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re *Ex Parte* Application of Porsche
Automobil Holding SE for an Order Pursuant
to 28 U.S.C. § 1782 Granting Leave to Obtain
Discovery for Use in Foreign Proceedings.

Case No. 1:15-mc-00417 (LAK)

DECLARATION OF LAURA T. SCHNAIDT
IN SUPPORT OF MOTION TO VACATE § 1782 ORDER AND FOR OTHER RELIEF

LAURA T. SCHNAIDT declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Chief Compliance Office of Marble Arch Investments, LP, and Marble Arch Investments GP, LLC (together, “Marble Arch”). I respectfully submit this declaration in support of the motion by Marble Arch, together with other respondents, to vacate the § 1782 order entered by the Court on December 29, 2015 (the “Order”), and for other relief including quashing of the subpoenas duces tecum and ad testificandum served on Marble Arch on December 30, 2015 (the “Subpoenas”).

2. Marble Arch Investments, LP (“LP”) is a Delaware limited partnership that is a plaintiff in the action pending in the Regional Court of Hanover, captioned *Effecten-Spiegel AG, et al. v. Porsche Automobil Holding SE*, Dkt. No. 18 O 175/15. Marble Arch Investments GP, LLC (“GP”), is a Delaware limited liability corporation that is the general partner of LP.

3. The principal place of business of both GP and LP is 645 Madison Avenue, Suite 17, New York, NY 10022. GP and LP share the same document management system, computer file server, email archiving system, computer network, and essential personnel.

Dated: January 22, 2016


Laura T. Schnaidt